

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

ELNORA CARTHAN, et al.,
Plaintiffs,

v.

RICK SNYDER, et al.,
Defendants.

Case No. 5:16-cv-10444-JEL-MKM
Hon. Judith E. Levy

**STIPULATION TO STAY THE CLASS PROCEEDINGS
RELATED TO THE VNA DEFENDANTS**

The Class Plaintiffs, together with certain Individual Claimants who are participating in this settlement (collectively “Plaintiffs”), on the one hand, and Defendants Veolia North America, LLC, Veolia North America, Inc., and Veolia Water North America Operating Services, LLC (collectively “VNA”) on the other hand, having reached a settlement in principle of all claims by the certain Plaintiffs as defined herein, hereby agree and stipulate to this Court’s entering a stay of all proceedings against VNA *only as to* the Consolidated Class Action case, *Carthan et al. v. Snyder et al.*, Case No. 5:16-cv-10444-JEL-MKM, and of the corresponding deadlines set forth in the Court’s scheduling order for the Class Action Trial, ECF No. 2435. In support of this motion, the Parties state as follows:

1. The Court’s “power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.” *Landis v. N. Amer. Co.*, 299 U.S. 248, 254 (1936); *see Clinton v. Jones*, 520 U.S. 681, 706 (1997) (“The District Court has broad discretion to stay proceedings as an incident to its power to control its own docket.”).

2. The Plaintiffs participating in this agreement have reached a settlement in principle of all claims against VNA, including those covered in the Consolidated Class Action case, *Carthan et al. v. Snyder et al.*, Case No. 5:16-cv-10444-JEL-MKM, as well as all claims by the certain Individual Claimants participating in the settlement.

3. Plaintiffs and VNA wish to finalize the settlement without burdening this Court with additional filings and pre-trial matters and without incurring unnecessary litigation expenses in the interim, particularly in light of the Class Action Trial that is presently scheduled to begin on February 13, 2024.

4. Accordingly, Plaintiffs and VNA jointly ask this Court to enter a forty-five (45) day stay of all proceedings in the Consolidated Class Action case, *Carthan et al. v. Snyder et al.*, Case No. 5:16-cv-10444-JEL-MKM, including the current Class Action Trial date, so that the parties can focus on finalizing the settlement agreement.

5. Plaintiffs and VNA stipulate that this stay of proceedings applies *only to* the Consolidated Class Action case, *Carthan et al. v. Snyder et al.*, Case No. 5:16-cv-10444-JEL-MKM, and does not apply to scheduling orders entered in other cases still pending against VNA that are not resolved by this partial settlement.

6. As provided in ECF Rule 11(c), Plaintiffs and VNA request that a text-only order be entered granting this stipulation.

Dated: February 1, 2024

STIPULATED AND AGREED TO:

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CERTIFICATE OF SERVICE

I hereby certify that on February 1, 2024, I electronically filed the foregoing document with the Clerk of the Court using the ECF System, which will send notification to the ECF counsel of record.

By: /s/ James M. Campbell
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